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ARIA Resort & Casino, LLC, and
MGM Resorts International

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERENDIRA DOMINGUEZ, individually, and
ALLISON LOPEZ, individually

Plaintiffs,

vs.

ARIA RESORT & CASINO, LLC, a domestic
limited liability company; MGM RESORTS
INTERNATIONAL; a foreign corporation
DOES I-X; and ROE BUSINESS ENTITIES I-
X, inclusive,

Defendants.

Case No.: 2:24-cv-01665-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND THE DISCOVERY AND
DISPOSITIVE MOTION
DEADLINES**

(First Request)

Defendants ARIA Resort & Casino, LLC (“ARIA”) and MGM Resorts International (“MGMRI”) (collectively, “Defendants”), by and through their counsel, the law firm of Jackson Lewis P.C., and Plaintiffs Erendira Dominguez and Allison Lopez (“Plaintiffs”), by and through their counsel, the law firm of Maier Gutierrez & Associates, hereby stipulate and agree as follows:

A. Discovery Completed to Date.

To date, the parties have engaged in the following discovery:

- 11/21/2024 – Plaintiffs’ Initial Disclosures pursuant to FRCP 26(a)(1);
- 11/21/2024 – Defendants’ Initial Disclosures pursuant to FRCP 26(a)(1);

- 1 • 12/03/2024 – Plaintiff’s First Supplemental Disclosures pursuant to FRCP 26(a)(1)
- 2 and 26(e);
- 3 • 12/06/2024 – Plaintiff Dominguez’s First Set of Requests for Production to
- 4 Defendant ARIA;
- 5 • 12/06/2024 – Plaintiff Dominguez’s First Set of Requests for Production to
- 6 Defendant MGMRI;
- 7 • 12/06/2024 – Plaintiff Lopez’s First Set of Requests of Production to Defendant
- 8 MGMRI;
- 9 • 12/06/2024 – Plaintiff Lopez’s First Set of Requests of Production to Defendant
- 10 ARIA;
- 11 • 12/06/2024 – Plaintiff’s Lopez’s First Set of Interrogatories to MGMRI;
- 12 • 12/11/2024 – Plaintiff’s Second Supplemental Disclosures pursuant to FRCP 26(a)(1)
- 13 and 26(e);
- 14 • 03/12/2025 – Defendants’ First Supplemental Disclosures pursuant to FRCP 26(a)(1)
- 15 and 26(e), and Defendants’ Responses to Plaintiffs’ respective First Sets of Requests
- 16 for Production to Defendants;
- 17 • 03/14/2025 – Plaintiffs’ Deposition of Doug Seidenberg;
- 18 • 03/18/2025 – Plaintiffs’ Deposition of Diana Castrillon;
- 19 • 03/27/2025 – Plaintiffs’ Subpoena Duces Tecum to Golf Adventures Marketing, Inc.
- 20 • 04/10/2025 – Defendants’ Second Supplemental Disclosures pursuant to FRCP
- 21 26(a)(1) and 26(e), and Defendants’ Supplemental Responses to Plaintiffs’ respective
- 22 First Sets of Requests for Production to Defendants;

23 **B. Discovery Which Still Needs to Occur.**

24 Plaintiffs intend to take the depositions of Nick Monti, Daniel Paoletta, Justin Andrews, Mary
 25 Calderon, Garrett Poinier, Deidre Fike, Alex Isaac, the FRCP 30(b)(6) witness(es) for Defendants,
 26 and may be seeking Court approval for additional depositions in light of the significant number of
 27 witnesses listed in Defendants’ disclosures. Defendants intend to take the depositions of Plaintiff
 28 Dominguez and Plaintiff Lopez. Both parties intend to serve written discovery requests. The parties

1 may take additional depositions and serve additional subpoenas depending on what the evidence
2 reveals as discovery progresses.

3 **C. Reasons Why Discovery Has Not Been Completed.**

4 The parties have been working diligently to complete discovery. Defendants have engaged
5 in reviewing voluminous amounts of electronically stored information that is potentially relevant to
6 the issues in this case and have been making rolling productions. This process has and continues to
7 take a substantial amount of time, but nonetheless is necessary to identify relevant evidence. The
8 parties have been allowing this process to complete before substantially continuing with key
9 depositions to ensure an efficient discovery process and to avoid the potential for having to reconvene
10 depositions for later disclosed information.

11 **D. Proposed Schedule for Completing Remaining Discovery.**

12 The parties propose the following schedule for completing remaining discovery:

- 13 • **Discovery Cut-Off Date** – The May 19, 2025, discovery cut-off date shall be
14 extended ninety (90) days to **August 18, 2025**. The ninetieth day falls on Sunday,
15 August 17, 2025, a non-judicial day, and therefore, in accordance with FRCP 6(a)(1),
16 advances to the next judicial day which is August 18, 2025.
- 17 • **Dispositive Motions** – The June 18, 2025, dispositive motions deadline shall be
18 extended to **September 17, 2025**, which is thirty (30) days after the discovery
19 deadline.
- 20 • **Pretrial Order** – If no dispositive motions are filed, the Joint Pretrial Order shall be
21 filed thirty (30) days after the date set for the filing of the dispositive motions, which
22 is **October 17, 2025**. In the event dispositive motions are filed, the date for filing the
23 Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the
24 dispositive motions or by further order of the Court.

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1 The Parties submit that these circumstances satisfy the required good cause to extend the
2 deadlines referenced above.

3 DATED this 22nd day of April, 2025.

4 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

5 /s/ Danielle J. Barraza

/s/ Joshua A. Sliker

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9 *Attorneys for Plaintiffs*

Attorneys for Defendants

10
11 **ORDER**

12 IT IS SO ORDERED:

13 

14 HON. DANIEL J. ALBREGTS

15 United States Magistrate Judge

16 Dated: 4/22/2025